

August 23, 2010

The Honorable Julius Genachoski, Chairman
The Honorable Michael Copps
The Honorable Robert McDowell
The Honorable Meredith Attwell Baker
The Honorable Mignon Clyburn
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WC Docket No. 02-60
Rural Health Care Support Mechanism

Dear Chairman Genochoski:

On July 14, 2010, the Federal Communications Commission (FCC) released a Notice of Proposed Rulemaking (NPR) on the above Docket. This letter is sent to address a matter that was not included in the NPR. However, it is hoped that after consideration, you are able to remedy a problem that will be sensible plus time and cost efficient.

In March 2005, the FCC changed its definition of "rural" health care facilities and temporarily grandfathered some organizations that technically no longer qualified for subsidies. According to a final rule published in the Federal Register on April 10, 2008, the FCC extended the grandfather period for an additional three years to July 2011. Fairbanks Memorial Hospital, Banner Health, along with other healthcare providers, is grateful for the extensions that have been granted.

Unless the 2005 definition of "rural" health care facilities is changed the Fairbanks Memorial Hospital will become ineligible. Fairbanks Memorial Hospital is located in Fairbanks Alaska. The hospital serves a remote area larger than many states. The nearest hospital is in Anchorage which is 360 miles to the South. If Fairbanks isn't considered rural then I am not sure what rural means.

It would be deeply appreciated if the FCC would consider the effects of the current "rural" definition and allow the aforementioned facilities and others facing the same challenge to be permanently grandfathered. If you have questions or would like to discuss this matter, you or your staff is welcome to call me at my office (907) 458-5215. Thank you for your thoughtful consideration of this request.

Respectfully,



Carl J. Kegley
IT Alaska Senior Director